

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

SHIRLEY Z. LEE,

Plaintiff,

v.

COMPASS BANCSHARES, INC.,

Defendant.

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**CIVIL ACTION NO.
1:05cv717-A**

REPORT OF PARTIES' PLANNING MEETING

Pursuant to the Court's September 8, 2005 order, the parties submit this Report of Parties' Planning Meeting.

1. Appearances.

The meeting was attended by:

- a. For the Plaintiff, Malcolm R. Newman.
- b. For the Defendant, Douglas B. Kauffman.

2. Pre-Discovery Disclosures.

The parties will exchange by October 21, 2005, the information required by Fed. R. Civ. P. 26(a)(1).

3. Discovery Plan. The parties jointly propose to the court the following discovery plan:

- a. Discovery will be needed on the following subjects:
 - 1. All information pertaining to plaintiff's claims and damages;
 - 2. The defendant's defenses.
- b. All discovery commenced in time to be completed by June 30, 2006.

c. There will be a maximum of 30 interrogatories, including subparts, by each party to any other party. The responses will be due 30 days after service.

d. There will be a maximum of 30 requests for production of documents, including subparts, by each party to any other party. The responses will be due 30 days after service.

e. There will be a maximum of 30 requests for admission by each party to any other party. Responses will be due 30 days after service.

f. The parties agree that no more than 5 depositions may be taken by the plaintiff and that no more than 5 depositions may be taken by the defendant. Each deposition is limited to a maximum of 8 hours unless extended by agreement of the parties.

g. Reports from retained experts under Rule 26(a)(2) will be due from the plaintiff by March 31, 2006, and from the defendants by May 5, 2006.

h. Supplementations of the disclosures under Rule 26(e) will be within 30 days before the end of the discovery period.

4. Other Items.

a. Scheduling Conference: The parties do not request a conference with the court before entry of the scheduling order.

b. Additional Parties and Amendments to the Pleadings: The Plaintiff should be allowed until November 30, 2005, to join additional parties and to amend the pleadings. Defendant should be allowed until December 30, 2005, to join additional parties and to amend the pleadings.

c. Pretrial Conference: Parties request a pretrial conference in July 2006.

d. Dispositive Motions: All potentially dispositive motions should be filed on or before April 14, 2006.

e. Settlement: Settlement cannot be evaluated at this time.

f. Trial Evidence: The final list of witnesses and trial evidence under Rule 26(a)(3) should be due three weeks before trial. The parties should have 15 days after service to list objections under Rule 26(a)(3).

g. Trial Date: The case should be ready for trial by the Court's trial term set for August 28, 2006, and at this time is expected to take approximately three days of trial time.

Date: September 22, 2005.

/s/ Malcolm R. Newman

Attorney for the Plaintiff

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